

**IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE**

TELISE TURNER, GARY WYGANT, and
FRANCIE HUNT,

Plaintiffs,

v.

CASE NO. 22-0287-IV

WILLIAM LEE, as Governor of Tennessee, in his
official capacity; TRE HARGETT, as Tennessee
Secretary of State, in his official capacity; and
MARK GOINS, as Tennessee Coordinator of
Elections, in his official capacity,

Chancellor Perkins
Chancellor Maroney
Judge Sharp

Defendants.

AFFIDAVIT OF DOUG HIMES

State of Tennessee)
County of Davidson)

I, Doug Himes, being duly sworn, depose and say:

1. I am over 18 years of age, a resident of the State of Tennessee, legally competent to give this affidavit and have personal knowledge of the facts set forth in this affidavit.

2. On January 9, 2023, Senior Assistant Attorney General Alex Rieger sent me Plaintiffs' expert Jonathan Cervas' "Response to Defendants' Expert Depositions Regarding Tennessee State House Reapportionment" dated January 9, 2023 (the "Supplemental Report").

3. On January 9, 2023, I accessed the only new map within Jonathan Cervas' Supplemental Report, "Map 13d_e", on Dave's Redistricting website through the URL hyperlink Dr. Cervas provided on page 1, footnote 2 of the Supplemental Report. The URL hyperlink Dr. Cervas provided on page 1, footnote 2 of his Supplemental Report read, in part, ". . . *See Map*

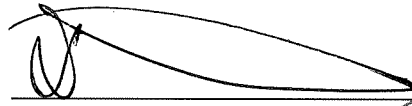
13d_e, [URL hyperlink]”.

4. I evaluated Map 13d_e on January 9, 2023.

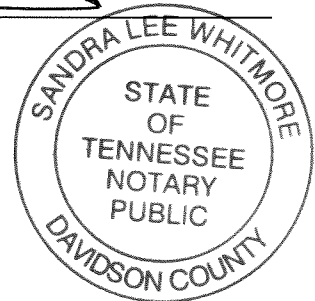
5. At that time, I observed that Map 13d_e contained multiple non-contiguous census blocks:

- one unpopulated non-contiguous census block in Sullivan County was assigned to District 1 yet was within District 3;
- one unpopulated non-contiguous census block in Sullivan County was assigned to District 1 yet was between Districts 3 and 4; and
- one populated non-contiguous census block remained in Dickson County assigned to District 78 yet was between Districts 68 and 69.

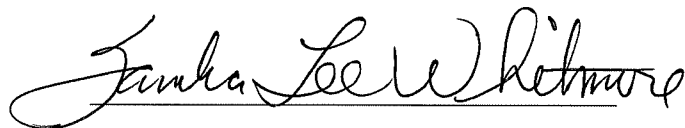
FURTHER AFFIANT SAITH NOT.



DOUG HIMES



Sworn to and subscribed before me this 22nd day of February, 2023.



NOTARY PUBLIC

My Commission Expires: 10/2/2023